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June 20, 2013

Via CM/ECF

Honorable Dennis F. Saylor IV
United States District Court Judge
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

**In re: New England Compounding Pharmacy, Inc. Products Liability Litigation,
Docket No. 1:13-md-2419-FDS**

This Document Relates To:

Hannah v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10407;
Jones v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10409;
Ramos v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10410;
Rios v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10411;
Rivera v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10412;
Tayvinsky v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10414;
Gould v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10444; and
Normand v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10447

Dear Judge Saylor:

This firm represents Defendants Inspira Health Network, Inc. and Inspira Medical Centers, Inc. (formerly known as South Jersey Health System, Inc. and South Jersey Hospital, Inc.) ("Inspira") in the above-referenced matters. We write to request that Your Honor not take any action on the Plaintiffs' Steering Committee's ("PSC") Motion for Entry of the proposed Case Management Order ("Motion") that was filed on June 18, 2013 (Document No. 185-1) until the Unaffiliated Defendants have had a chance to review the proposed Case Management Order ("CMO") and file objections because, to our knowledge, no clinic or healthcare provider, which make up the majority of the Unaffiliated Defendants, participated in the drafting of the proposed CMO.

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While we respect the efforts of the PSC, the Official Committee of the Unsecured Creditors, the Chapter 11 Trustee, and the NECC-Affiliated Defendants, the CMO does not “address[] primarily...matters that concern the Affiliated Defendants” as represented. Instead, the bulk of the CMO, particularly pages 8-20, pertain – in some cases, almost exclusively – to the Unaffiliated Defendants and concern matters of grave importance such as Settlement Discussions, Mediation, and most importantly Discovery, some of which set forth rather aggressive deadlines as to the Unaffiliated Defendants only.

Further, the PSC’s Motion (Document No. 185) requests “that if the Court finds some provisions appropriate but has (*sic*) questions about others, that (*sic*) the Court not wait until the next status conference to enter an order that addresses the unobjectionable provisions.” Since Inspira and most, if not all, other Unaffiliated Defendants did not consent to the scope or the breadth of the CMO that affects them directly, and because the Unaffiliated Defendants should be part of the process going forward, we respectfully request that Your Honor refrain from deciding the PSC’s motion until all oppositions/objections are filed and considered by the Court.

Respectfully submitted,



Stephen A. Grossman

cc: All counsel of record (via CM/ECF)

CERTIFICATE OF SERVICE

I, **STEPHEN A. GROSSMAN**, hereby certify that I caused a true and correct copy of the foregoing letter to be filed electronically via the Court's electronic filing system.

Dated: June 20, 2013

s/ Stephen A. Grossman
Stephen A. Grossman